

EXHIBIT 1

From: Igor Litvak <Igor@LitvakLawNY.com>
Sent: Thursday, June 2, 2022 6:39 PM
To: Laura Harris; Paul Weeks; Luke Roniger
Cc: Andrew Michaelson; Sumon Dantiki; Matthew Bush
Subject: Re: Rule 26(f) Report

CAUTION: MAIL FROM OUTSIDE THE FIRM

Laura, just because State Department's website has some note it doesn't make it so, we don't even know on what that is based on, that site has more errors and mistakes than you can imagine, we need something more authoritative. The case you sent me yesterday doesn't do a better job. For now my clients are insisting on conducting a deposition in Russia virtually, the discovery rules allow for that. Also as far as they and I know there is no prohibition against that in the Russian penal code, and although their Russian attorneys are working to find out the answer, I won't know it by tomorrow 12 pm. Therefore, unless you can point to a specific Russian statute that forbids it I really don't see a problem, especially since we are proposing for it to be done virtually, so you will be safe in US. If no other option then my clients would be willing to appear in Kazakhstan for the depos, but they are saying June is not possible, they can realistically make it happen sometime in the first half of July. They have not yet started the process of applying for international passports, but they can start it soon and expect to receive them within 3 to 4 months. In terms of what other countries they can travel to using their internal Russian passports, the list is very short, as far as we know its Abkhazia, Kirgistan, and South Ossetia. Kirgistan they are not willing to go to, other places are not really practical either. This leaves only Russia virtually or Kazakhstan in person as possible options. Lastly, please let me know if you had a chance to contact Magistrate Figueredo, thanks.

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From: Laura Harris <lharris@kslaw.com>
Sent: Thursday, June 2, 2022 2:04 PM
To: Igor Litvak <Igor@LitvakLawNY.com>; Paul Weeks <PWeeks@KSLAW.com>; Luke Roniger <LRoniger@KSLAW.com>
Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>
Subject: RE: Rule 26(f) Report

Igor,

It is clear that we cannot hold Defendants' depositions in Russia. See U.S. Dep't of State, Bureau of Consular Affairs, Russia Judicial Assistance Information, available at <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/RussianFederation.html> ("The Russian Federation does not permit the taking of voluntary depositions of willing witnesses in civil and commercial matters."). Nor is Belarus an appropriate forum due to the State Department's Level 4 "Do Not Travel" advisory for US citizens.

We're looking into whether Kazakhstan is a viable option, including whether we can arrange for in-person depositions at the US Embassy in Nur-Sultan. Can you confirm that your clients are willing and able to appear for depositions in Kazakhstan later this month? Is it correct that, as of today, your clients have not started the process of applying for an international passport? Finally, it is our understanding that internal Russian passports allow citizens to travel to places other than Belarus and Kazakhstan. Please provide a list of all the countries to which your clients can travel with their current internal passports.

Separately, the Court has ordered us to reach out to Magistrate Figueredo to arrange time with her in July or August. Please let me know whether you agree to our contacting Judge Figueredo today.

Thank you,
Laura

Laura Harris
Partner

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From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Thursday, June 2, 2022 9:08 AM

To: Paul Weeks <PWeeks@KSLAW.com>; Laura Harris <lharris@kslaw.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>

Subject: Re: Rule 26(f) Report

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Laura and Paul,

I still believe that the deposition can be done in Russia, the case you sent is not dispositive on that issue and it's exactly clear exactly what it means, I will try to do further research on it today. My clients tell me there is no prohibition under the Russian law for them or for google to conduct deposition in Russia, we can do it virtually. As an alternative we propose a country of Belarus or Kazakhstan. These are the only options since my clients don't have International Russian passports to travel and getting one would take 3 to 4 months. In Russia people have two passports, internal and international, my clients only have internal passports, using their internal Russian passports they can only travel to those two countries.

Igor.

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From: Paul Weeks <PWeeks@KSLAW.com>

Sent: Wednesday, June 1, 2022 5:40:27 PM

To: Igor Litvak <Igor@LitvakLawNY.com>; Laura Harris <lharris@kslaw.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>

Subject: RE: Rule 26(f) Report

Igor,

Please see the attached case.

Thanks,

Paul

Paul Weeks

Senior Associate

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From: Igor Litvak <Igor@LitvakLawNY.com>

Sent: Wednesday, June 1, 2022 5:23 PM

To: Laura Harris <lharris@kslaw.com>; Paul Weeks <PWeeks@KSLAW.com>; Luke Roniger <LRoniger@KSLAW.com>

Cc: Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>

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Laura, please email me that Russian law that makes it illegal to depose my clients in Russia, thank you.

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